

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

PACIFIC GULF SHIPPING CO.,	§	Case No.	3:18-CV-02076-MO
	§		
Plaintiff,	§		
	§		
v.	§	DECLARATION	
	§		
ADAMASTOS SHIPPING & TRADING	§		
S.A., VIGOROUS SHIPPING &	§	IN ADMIRALTY	
TRADING S.A., BLUE WALL SHIPPING	§		
LTD., and PHOENIX SHIPPING &	§		
TRADING S.A.,	§		
	§		
Defendants.	§		

My name is Efstahios Gourdomichalis. I am over the age of 21 years, and am fully capable and competent of making this declaration, I have personal knowledge of the facts below, and declare that the following facts are true and correct under penalty of perjury under the laws of the United States of America pursuant to Title 28 U.S.C. Section 1746.

1. My business address is 47-49 Akti Miaouli, Piraeus, Greece GR-18536.
2. I am the Secretary and Treasurer of Vigorous Shipping & Trading S.A. (“Vigorous Shipping”).
3. I am authorized to make this declaration on behalf of Vigorous Shipping in the above-captioned matter.
4. Vigorous Shipping is incurring the following charges on a daily basis in U.S. Dollars as a result of the seizure:

a. Daily loss of profit (daily hire)	\$12,000.00
b. Dockage/Security per day	\$3,663.00

c. Agency Cost per extra day	\$475.00
d. Low sulphur mgo consumption per day 4,1mt X 748USD	\$3,066.80 -----
e. Total daily costs:	\$19,204.80

At the time of the Court's scheduled hearing on December 12, 2018, the vessel had been under seizure for approximately 9 days. The estimated costs incurred by that time are \$172,843.20.

5. Based upon the above, in the event the Court sets a thirty-day discovery timeframe from December 17, 2018 through January 16, 2019, I would estimate that Vigorous Shipping will incur the following charges on a daily basis. At the same time, I respectfully request that the Court instruct Pacific to post a bond at 150% of the following amount to account for additional costs which may arise over the next month beyond those outlined herein.

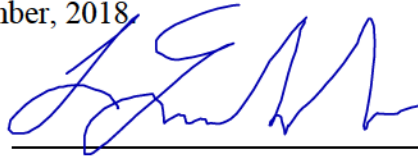
a. 12/3/18 – 12/12/18:	\$172,843.20
b. 12/13/18 – 1/16/19:	\$20,000 p/d [approx.] x 35 days = \$700,000
c. TOTAL:	\$872,843.20
d. Plus 150%	\$1,309,264.20

6. The costs referenced above only represent Vigorous Shipping's direct costs arising out of the detention. As the Court is aware, the Vessel is currently laden with a cargo of wheat that is destined for delivery to Yemen. See Dkt. 33. The value of the cargo is

reportedly in the range of **\$13,000,000**. I understand that the cargo faces the risk of spoliation / deterioration within the next month.

7. If the cargo at issue is destroyed, or the charterer terminates the charter agreement, then Vigorous Shipping will not be able to earn freight in the amount of **\$3,000,000** that was earmarked for this specific voyage.

Executed on this 17 day of December, 2018.

A handwritten signature in blue ink, appearing to be 'J. G. M.', is written over a horizontal line.

[Declarant]